

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

**GLORIA PUMPHREY and ANGALYN  
JONES, for themselves and on behalf of all  
similarly situated individuals,**

**Plaintiffs,**

**v.**

**EXPERIAN INFORMATION  
SOLUTIONS, INC.,**

**Defendant.**

**Civil Action No.: 3:11-CV-574**

**JOINT MOTION TO ENTER STIPULATED PROTECTIVE ORDER**

Plaintiffs Gloria Pumphrey and Angalyn Jones and Defendant Experian Information Solutions, Inc. (“Experian”), through their respective attorneys of record, respectfully request that the Court enter the accompanying Stipulated Protective Order (attached as Exhibit 1) to facilitate document disclosure and production in this matter and to protect the parties’ confidential proprietary and/or business information.

Dated: February 29, 2012

/s/ Leonard A. Bennett

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 29th day of February, 2012, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will then send a notification of such filing to the following:

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